

1 Benjamin K. Riley (SBN 112007)  
**HOWREY LLP**  
2 525 Market Street, Suite 3600  
San Francisco, California 94105  
3 Telephone: (415) 848-4900  
Facsimile: (415) 848-4999

4 Stephen D. Libowsky (*pro hac vice* to be submitted)  
**HOWREY LLP**  
5 321 North Clark Street, Suite 3400  
Chicago, IL 60610  
6 Telephone: (312) 595-1239  
7 Facsimile: (312) 595-2250

8 Attorneys for Defendant  
ENTERPRISE TRUST COMPANY

GOMESZ  
LIBOWSKY

JAN 15 2008

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA

CV 08

WDB  
0266

13 RUTHE P. GOMEZ, ) Case No.  
14 Plaintiff, )  
15 vs. )  
16 TRADERIGHT CORP. d/b/a TRADERIGHT ) DECLARATION OF REBECCA  
SECURITIES, INC., ENTERPRISE TRUST ) TOWNSEND IN SUPPORT OF NOTICE OF  
COMPANY, and LOCKE HAVEN, LLC, ) REMOVAL PURSUANT TO 28 U.S.C. §  
17 ) 1441(b) (DIVERSITY)  
18 Defendants. )  
19 )  
20 )  
21 )  
22 )  
23 )  
24 )  
25 )  
26 )  
27 )  
28 )

1  
2  
**DECLARATION OF REBECCA TOWNSEND**

3 I, Rebecca Townsend, declare as follows:

4 1. I am Vice President, and the main client manager, of Defendant Enterprise Trust  
 5 Company; and, I am one of the four members of Defendant Locke Haven, LLC. I am familiar with the  
 6 accounts of Plaintiff Ruthe P. Gomez, at issue in this action. I make this Declaration of my personal  
 7 knowledge and, if called upon as a witness, could and would testify competently, under oath, to the  
 8 facts contained herein.

9 2. Defendant Enterprise Trust was at the time of the filing of this action, and still is at the  
 10 time of the filing of the Notice of Removal, a corporation organized under the laws of Nevada, and has  
 11 its principal place of business in Henderson, Nevada.

12 3. Defendant Locke Haven, LLC was at the time of the filing of this action, and still is at  
 13 the time of the filing of the Notice of Removal, a limited liability corporation organized under the laws  
 14 of the State of Illinois, and has its principal place of business in Lockport, Illinois.

15 4. Defendant Locke Haven, LLC is made up of four members: George Dragel, Mike  
 16 Rukuzo, John H. Lohmeier and me. I have personal knowledge that all four of us are citizens of the  
 17 State of Illinois. None of us is a citizen of the State of California.

18 5. The total value of Plaintiff Gomez's accounts at issue in this proceeding equals  
 19 approximately \$900,000.

20

21 Executed on January 15, 2008, at Dale Boly, Illinois.

22 I declare under penalty of perjury under the laws of the United States of America that the  
 23 foregoing is true and correct.

24



25  
26  
27  
28  
Rebecca Townsend